

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Marathon Petroleum Products
100 Marathon Avenue
Robinson, IL 62454

ATTENTION:

Alan Mayo
Environmental Coordinator

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Marathon (Marathon or you) to submit certain information about your facility at 100 Marathon Avenue, Robinson, Illinois.

Appendix B specifies the information that you must submit. You must send this information to us according to the schedule in Appendix B.

We are issuing this information request under section 114(a) of the Clean Air Act (the Act), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Marathon owns and operates an emission source at your Robinson, Illinois facility. We are requesting this information to determine whether your emission source is complying with the Clean Air Act.

You must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

With copies to Illinois Environmental Protection Agency :

David Bloomberg - Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

And

Rob Robeen – Bureau of Air
Illinois Environmental Protection Agency
2125 South First Street
Champaign, IL 61820

Under 40 C.F.R. Part 2, Subpart B, you may assert a claim of business confidentiality for any portion of the submitted information. You must specify the page, paragraph, and sentence when identifying the information subject to your claim. Appendix A specifies the assertion and substantiation requirements for business confidentiality claims.

Marathon must submit all requested information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

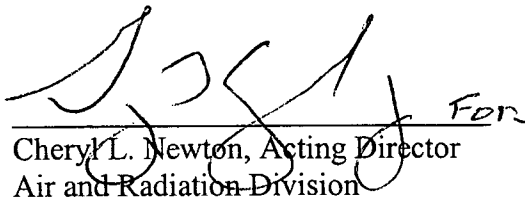
We may use any information submitted in response to this request in an administrative, civil, or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation. To aid in our electronic record keeping efforts, please provide your response to this request for information without staples. Paper clips, binder clips, and 3-ring binders are acceptable.

Failure to comply fully with this request for information may subject Marathon to an enforcement action under section 113 of the Act, 42 U.S.C. § 7413.

You should direct any questions about this request for information to Brian Dickens at (312) 886-6073.

4/24/08
Date


Cheryl L. Newton, Acting Director
Air and Radiation Division

Appendix A

Confidential Business Information (CBI) Assertion and Substantiation Requirements

A. Assertion Requirements

You may assert a business confidentiality claim covering all or part of the information requested in the attached letter, as provided in 40 C.F.R. §2.203(b). To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document over which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a legend to indicate the intent to claim confidentiality. The stamped or typed legend, or other suitable form of notice, should employ language such as "trade secret" or "proprietary" or "company confidential" and indicate a date if any when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by the U.S. Environmental Protection Agency only to the extent permitted and by means of the procedures set forth by Section 114(c) of the Clean Air Act (the Act), and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise nonconfidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you.

Please segregate personnel, medical and similar files from your responses and include that information on separate sheet(s) marked as "Personal Privacy Information" given that disclosure of such information to the general public may constitute an invasion of privacy.

B. Substantiation Requirements

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. §2.208 which provides in part that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; and that the information is not and has not been reasonably obtainable by legitimate means without your consent.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking you to substantiate fully your CBI claim. If you receive such a letter, you must provide EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential. **You must be specific by page, paragraph, and sentence when identifying the information subject to your claim.** Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you

identify as being subject to CBI, you must answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Any other issue you deem relevant.

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2. "Emission data" means, with

reference to any source of emission of any substance into the air-

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. §§ 2.301(a)(2)(i)(A), (B) and (C).

Emission data includes, but is not limited to, service records stating the amount of refrigerant added to a unit or reclaimed from a unit.

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by, and by means of the procedures set forth in, 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Appendix B

Request to Provide Information

In accordance with the foregoing Request to Provide Information Pursuant to the Clean Air Act, Marathon must provide the following information within 45 days of its receipt of this request. This information may be submitted electronically.

1. For each flare #1 through #7, for each day beginning on January 1, 2006 through the date of your receipt of this request, provide the average mass flow rate of organic material to that flare, in lb/hr, as four-hour averages (provide six, 4-hour averages for each day). Provide a narrative explanation of how Marathon arrived at its response.
2. For each flare #1 through #7, for each day beginning on January 1, 2006 through the date of your receipt of this request, provide the average mass flow rate of steam applied to that flare, in lb/hr, at all locations on the flare (i.e. the sum of seal, upper, lower, winterizing, etc.) during the venting period as four-hour averages (provide six, 4-hour averages for each day). Provide a narrative explanation of how Marathon arrived at its response.
3. For each flare #1 through #7, for each day beginning on January 1, 2006 through the date of your receipt of this request, provide the average steam-to-organic gas ratio (lb steam/lb organic compounds) for each four-hour period of that day.
4. For each flare #1 through #7, for each day beginning on January 1, 2006 through the date of your receipt of this request, provide the daily average heat content (BTU/scf) of the vent stream to each flare. Provide a narrative explanation of how Marathon arrived at its response.
5. For each flare #1 through #7, provide the minimum steam addition rate, in lb/hr, that Marathon has supplied since January 1, 2006 at all locations on the flare (e.g. center, ring, seal).
6. Provide copies of all documents in Marathon's possession that prescribe or recommend the amount of steam to be added to the #1 through #7 flares. In other words, provide a copy of the entire document if within the document it states the maximum steam rate, minimum steam rate, steam addition rate associated with an organic material vent scenario, general steam-to-organic gas ratio, or any other reference to steam addition.

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Alan Mayo
Environmental Coordinator
Marathon Petroleum Products
100 Marathon Avenue
Robinson, IL 62454

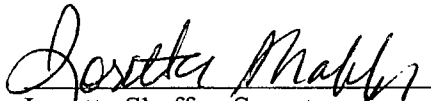
I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by First Class Mail to:

David Bloomberg - Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

and

Rob Robeen – Bureau of Air
Illinois Environmental Protection Agency
2125 South First Street
Champaign, IL 61820

on the 25 day of April 2008.


Loretta Shaffer, Secretary
AECAS(MN/OH)

Certified Mail Receipt Number: 70010320 0006 0187 6737



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 24 2008

REPLY TO THE ATTENTION OF:
(AE-17J)

Gary C. Barnett
Aleris International Inc.
25825 Science Park Drive, Suite 400
Beachwood, Ohio 44122-7392

Dear Mr. Barnett:

This letter is in response to your letter dated March 27, 2008, requesting an official determination of alternative methodologies to conduct stack testing, monitoring, recordkeeping, and reporting for the aluminum scrap shredder and delacquering kiln at the Aleris International Inc. (Aleris) facility located at 7335 Newport Road, S.E., Uhrichsville, Ohio. The alternative methodologies for which Aleris is requesting approval concern the requirements of National Emissions Standards for Hazardous Air Pollutants for Secondary Aluminum Production, 40 C.F.R. Part 63, Subpart RRR, as related to the aluminum scrap shredder and delacquering kiln. Specifically, 40 C.F.R. § 63.1510(e) requires:

"the owner or operator of an affected source or emission unit subject to an emission limit in kg/Mg (lb/ton) or µg/Mg (gr/ton) of feed/charge must install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the affected source or emission unit over the same operating cycle or time period used in the performance test."

The requested alternative methodologies and the U.S. Environmental Protection Agency's (EPA's) responses are stated below.

Determination:

We have reviewed the information Aleris provided, the underlying regulations and previous determinations. Based on our review, we conclude the following:

Delacquering Kiln Feed/Charge Weight during Stack Test

The first item requested concerns the weighing of feed/charge material. Scrap is first fed to a hopper, which continuously feeds a shredder. The shredder discharges onto a conveyor, which then feeds a delacquering kiln. This configuration does not allow the separate weighing of the feed/charge into the delacquering kiln. Therefore, Aleris requests approval to use the shredder feed/charge weight minus the weight of the non-aluminum materials collected after the shredder to calculate the delacquering kiln feed/charge weight. These weights will be determined with scales capable of +/- one (1) percent accuracy.

EPA approves the proposed method for determining the delacquering kiln feed/charge weight during testing for the aluminum scrap shredder and delacquering kiln at the Aleris facility in Uhrichsville, Ohio with the following conditions:

1. The afterburner and/or lime injected baghouse will be monitored in accordance with the regulations (i.e., afterburner temperature, baghouse inlet temperature, lime injection rate);
2. A scale capable of accuracy within +/- one (1) percent shall be used to weigh the shredder feed/charge weight for each test run;
3. A scale capable of accuracy within +/- one (1) percent shall be used to weigh the non-aluminum materials from the shredder for each test run;
4. The delacquering kiln feed/charge weight for each test run shall be determined by subtracting the non-aluminum materials from the shredder feed/charge weight.

Delacquering Kiln Feed/Charge Weight during Normal Operations

During normal operations, the feed/charge cannot be weighed separately prior to being fed into the delacquering kiln, because the shredder output is continuously fed to the delacquering kiln. Aleris requests approval to maintain records based on the following procedure during normal operations. The shredder feed/charge weight will be based on truckload quantity, and the feed/charge weight will be kept in twelve (12)-hour shift blocks. Each truckload of scrap is fed into the shredder. Aleris will use the weight of individually identified and weighed truckloads of scrap received. The total weight of each truckload processed during a twelve (12)-hour shift will be determined, and any truckload that crosses the twelve (12)-hour shift period will be apportioned based on the hours run for each shift. Aleris will calculate these weights by using the shredder feed/charge weight minus the weight of the non-aluminum materials collected during the twelve (12)-hour shift period.

EPA approves the proposed method to use twelve (12)-hour shifts for the shredder feed/charge weight during normal operations, as well as the proposed method for keeping the delacquering kiln feed/charge rate in twelve (12)-hour shifts. The delacquering kiln feed/charge weight shall be calculated by using the shredder feed/charge weight minus the weight of the non-aluminum materials collected during the twelve (12)-hour shift period. A scale capable of accuracy within +/- one (1) percent shall be used for the shredder feed/charge weight, and the weight of the non-aluminum materials collected during the twelve (12)-hour shift period.

If you have any questions or concerns regarding this determination, please feel free to call Reza Bagherian at (312) 886-0674.

Sincerely yours,


George T. Czerniak, Chief
Air Enforcement and Compliance Assurance Branch

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

DATE: 4/24/08

SUBJECT: Final Resolution of Alleged Violations Voluntarily Disclosed to EPA of Krendl Machine Company in Delphos, Ohio.

FROM: George Czerniak, Branch Chief
Air and Radiation Division



TO: Cheryl L. Newton, Acting Director
Air and Radiation Division

This memorandum recommends that you accept the proposed letter as the final resolution of alleged violations voluntarily disclosed to the U. S. Environmental Protection Agency (EPA) on August 29, 2007 by Krendl Machine Company (Krendl). The letter will serve as final resolution concerning Krendl's voluntarily disclosed violations of the Ohio State Implementation Plan (at Ohio Admin. Code § 3745-31-02(A)), by failing to apply for air permits to install and operate two paint booths that were installed in February 2000, and for a plasma cutter and associated particulate control equipment that was installed in October 2006.

EPA has determined that Krendl has complied with all nine (9) criteria of the EPA's April 11, 2000, Self Disclosure Policy, "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of violations Final Policy Statement" (Audit Policy) (65 Fed. Reg. 19618). Accordingly, EPA has recommended a 100% reduction of the gravity portion of the potential penalty in this matter. In addition, EPA has determined that Krendl has not gained a significant economic benefit by failing to comply.

EPA, however, reserves the right to revoke this final determination and, thereby, render such final determination null and void, if and to the extent that any information or certification provided by Krendl upon which any civil penalty mitigation granted for such violation was based, was materially false or inaccurate at the time such information or certification was provided to the EPA.

For the reasons set forth above, I recommend that you approve and sign the letter.